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8 NAPA VALLEY COMMUNITY COLLEGE DISTRICT

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 ROBIN ROWE,

13 Plaintiff,

14 v.

15 NAPA VALLEY COMMUNITY COLLEGE
16 DISTRICT,

17 Defendant.

Case No. 4:17-cv-06129-KAW

**STIPULATION AND [PROPOSED] ORDER
EXTENDING MEDIATION DEADLINE**

18 **Hon. Kandis A. Westmore**

19 IT IS HEREBY STIPULATED BY AND BETWEEN the parties to the above captioned matter
20 that the mediation deadline of July 31, 2018, be continued 60 days to September 29, 2018. Trial is set for
21 April 22, 2019.

22 At the Case Management Conference on March 27, 2018, the Court ordered plaintiff ROBIN
23 ROWE and defendant NAPA VALLEY COMMUNITY COLLEGE DISTRICT (collectively, the
24 “Parties”) to complete mediation no later than July 31, 2018.

25 The Parties wish to apprise the Court in advance of the upcoming Case Management Conference
26 that they will be unable to complete the mediation by the court-ordered date. The Parties jointly request
27 that the date to complete mediation be extended to September 29, 2018.

28 The Parties agreed to use ADR Administrator Howard Herman. At the pre-mediation phone

1 conference on May 15, 2018, the Parties and Mr. Herman tentatively agreed to set an initial mediation
2 date of August 22, 2018. This was the date that worked for Mr. Herman that also allowed the Parties to
3 complete initial written discovery and take Plaintiff's deposition in advance of the mediation. Plaintiff's
4 deposition is set for July 16, 2018.

5 As such, for the good cause stated above, the Parties respectfully request that the Court extend the
6 Parties' deadline to complete mediation from July 31, 2018, to September 29, 2018.

7 The Parties respectfully request that the Court approve this stipulation and incorporate its terms in
8 an Order.

9 It is so stipulated and agreed.

10
11 Dated: June 12, 2018

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

12
13 By: /s/ Isabella Reyes
14 Isabella D. Reyes
15 Attorneys for Defendant
NAPA VALLEY COMMUNITY COLLEGE
DISTRICT

16
17 Dated: June 12, 2018

LEIGH LAW GROUP, P.C.

18
19 By: /s/ Jay Jambeck
20 Jay T. Jambeck
21 Attorneys for Plaintiff
ROBIN ROWE

22 **ATTORNEY ATTESTATION**

23 I hereby attest that I have on file all holograph signatures for any signatures indicated by a
24 conformed signature ("s") within this E-filed document or have been authorized by Plaintiff's counsel
25 to show their signature on this document as /s/.

26
27 Dated: June 12, 2018

By: /s/ Isabella Reyes
Isabella D. Reyes

ORDER

Pursuant to the Stipulation of the parties filed and entered herewith:

Good cause appearing, IT IS SO ORDERED: The July 31, 2018 mediation compliance date is vacated. The parties shall complete mediation by September 28, 2018.

IT IS SO ORDERED.

DATED: 6/14/18

Kandis Westmore
Kandis A. Westmore
UNITED STATES MAGISTRATE JUDGE